

James C. Krieg (SBN 77069) (jkrieg@kksrr.com)
 Stan G. Roman (SBN 87652) (sroman@kksrr.com)
 Krieg, Keller, Sloan, Reilley & Roman LLP
 114 Sansome Street, 4th Floor
 San Francisco, CA 94104
 Telephone: (415) 249-8330
 Facsimile: (415) 249-8333

Attorneys for Defendant
 McGUIREWOODS LLP

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re:
 CROWN VANTAGE, INC.
 Debtor,
 Employer I.D. #54-1752384

CASE NO. C 02-03836 ~~WHA~~ MMC

Consolidated with:

CASE NO. C-02-03838 WHA
CASE NO. C-02-03839 WHA

CROWN PAPER LIQUIDATING
 TRUST,

Plaintiff,

v.

PRICEWATERHOUSECOOPERS LLP
 f/k/a COOPERS & LYBRAND; ERNST &
 YOUNG; McGuire, WOODS, BATTLE &
 BOOTH; MERRILL LYNCH & CO.;
 MERRILL, LYNCH, PIERCE, FENNER
 & SMITH; SALOMON BROS.;
 DONALDSON, LUFKIN & JENRETTE;
 HOULIHAN LOKEY HOWARD &
 ZUKIN; CLIFFORD CUTCHINS;
 STEPHEN HARE; ERNST LEOPOLD; E.
 LEE SHOWALTER; ROBERT C.
 WILLIAMS; WILLIAM DANIEL; and
 JOSEPH T. PIEMONT,

Defendants.

**STIPULATION AND ~~[PROPOSED]~~ ORDER
 CONTINUING HEARING AND BRIEFING
 DATES FOR DEFENDANT
 MCGUIREWOODS LLP'S MOTION FOR
 ATTORNEYS' FEES**

Dept: Courtroom 7, 19th Floor
 Judge: Hon. Maxine M. Chesney

1 Pursuant to Rule 6-2 of the Local Rules of the Northern District of California, plaintiff Crown Paper
2 Liquidating Trust (the "Trust") and Defendant McGuireWoods LLP ("McGuireWoods") stipulate as
3 follows and respectfully request that the Court enter their Proposed Order.

4 WHEREAS on July 12, 2004, this Court granted Defendant McGuireWoods' Motion to Dismiss
5 this action with prejudice;

6 On July 28, 2004, McGuireWoods filed a Motion for Attorneys' Fees, arguing that McGuireWoods
7 was entitled to attorneys' fees under the terms of an Option and Settlement Agreement, but requesting that
8 the Court defer ruling on the attorneys' fees motion until proceedings in the Delaware Chancery Court
9 (the "Delaware Action") involving the Option and Settlement Agreement were resolved;

10 On January 12, 2005, this Court issued an order finding that "because significant issues concerning
11 the contract under which McGuireWoods seeks an award of attorney's fees are pending in the Delaware
12 Action, the court finds it appropriate to deny the motion at this time, without prejudice to refile upon
13 completion of the proceedings in Delaware." The Court held that McGuireWoods could refile its
14 attorneys' fee motion no later than fourteen days after entry of a final judgment in the Delaware Action.

15 The Delaware Action was dismissed without prejudice on December 21, 2005;

16 The parties are discussing a resolution of McGuireWoods' claim for attorneys' fees that will not
17 require the Court to consider or rule at this time upon the factually and legally complex issues involved,
18 thereby saving the Court and parties substantial time and expense;

19 Most of the attorneys for McGuireWoods working on this case will be on holiday vacations until
20 shortly before the date the attorneys' fee motion is presently due;

21 The requested extension of time will not have an adverse effect on the schedule of this case because
22 the Trust's appeal of this Court's order granting McGuireWoods' Motion to Dismiss is still pending
23 before the Ninth Circuit Court of Appeals and no notice of hearing has yet been received;

24 IT IS HEREBY STIPULATED AND AGREED THAT, subject to Court approval, the last day for
25 McGuireWoods to file its Motion for Attorneys' fees shall be continued from January 4, 2006 to March 3,
26 2006.

27 ////

28 ////

Krieg, Keller, Sloan, Reilley & Roman LLP

Beus Gilbert PLLC

2

STIPULATED AND AGREED:

Dated: December 23, 2005

Krieg, Keller, Sloan, Reilley & Roman LLP

By: _____

STAN ROMAN
Attorneys for Defendant McGuireWoods LLP

Dated: December 23, 2005


Beus Gilbert PLLC

By: _____

MALCOLM LOEB
Attorneys for Plaintiff Crown Paper Liquidating Trust

IT IS SO ORDERED.

Dated: December 27, 2005


Hon. Maxine M. Chesney
United States District Court Judge

STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING AND BRIEFING DATES FOR
DEFENDANT MCGUIREWOODS LLP'S MOTION FOR ATTORNEYS' FEES
Case Nos. C 02-3836; C 02-3838; and C 02-3839